

1 CHARLES A. MICHALEK, ESQ.  
2 Nevada Bar No. 5721  
3 ROGERS, MASTRANGELO, CARVALHO & MITCHELL  
4 700 South Third Street  
5 Las Vegas, Nevada 89101  
6 Phone: (702) 383-3400  
7 Email: [cmichalek@rmclaw.com](mailto:cmichalek@rmclaw.com)

5 Brian T. Maye (admitted *pro hac vice*)  
6 Matthew D. Martin (admitted *pro hac vice*)  
7 ADLER MURPHY & McQUILLEN LLP  
20 South Clark Street, Suite 2500  
Chicago, Illinois 60603  
Phone: (312) 345-0700  
Email: [bmaye@amm-law.com](mailto:bmaye@amm-law.com)  
[mmartin@amm-law.com](mailto:mmartin@amm-law.com)

*Attorneys for Defendants Frontier Airlines, Inc.,  
Scott Warren, and Rex Shupe*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as  
next friend of A.D., a Minor, ) Case No.: 2:19-cv-01322-KJD-DJA

*Plaintiffs,*) **FRONTIER'S RESPONSE TO  
PLAINTIFFS' MOTION FOR LEAVE  
TO FILE EXHIBIT A UNDER SEAL**

FRONTIER AIRLINES, INC.,  
SCOTT WARREN, and REX SHUPE,

### *Defendants.*

**DEFENDANT FRONTIER AIRLINES, INC.'s  
RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO FILE  
EXHIBIT A TO MOTION FOR SANCTIONS UNDER SEAL**

Defendant Frontier Airlines, Inc., (“Frontier”), by its undersigned counsel, submits this Response to Plaintiffs’ Motion for Leave to File Exhibit A Under Seal (ECF #130).

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1       On August 20, 2021, Plaintiffs filed a Motion for Sanctions Against Frontier Airlines, Inc. (ECF  
2 #128). Concurrently, Plaintiffs filed a Motion for Leave to File Exhibit A to the Motion for Sanctions  
3 Under Seal (ECF #130), pursuant to Local Rule IA 10-5. Exhibit A contains documents previously  
4 produced by Frontier during discovery and which were designated as Confidential by Frontier pursuant to  
5 the Parties' Agreed Protective Order (ECF #37).

7       Frontier will be filing its Opposition to Plaintiffs' Motion for Sanctions; however, Frontier has no  
8 objection to Plaintiffs' request to file Exhibit A to their Motion under seal. Given Plaintiffs' challenge to  
9 Frontier's designation of these documents as confidential, Frontier will move separately for an order  
10 establishing the applicability of the Confidential designation to these particular documents, in accordance  
11 with the Agreed Protective Order (ECF #37).

13 DATED this 3rd day of September, 2021

Respectfully submitted,

15 /s/ Brian T. Maye

16 Brian T. Maye (admitted *pro hac vice*)  
17 Matthew D. Martin (admitted *pro hac vice*)  
18 ADLER MURPHY & McQUILLEN LLP  
19 20 South Clark Street, Suite 2500  
20 Chicago, Illinois 60603  
Phone: (312) 345-0700  
Email: [bmaye@amm-law.com](mailto:bmaye@amm-law.com)  
[mmartin@amm-law.com](mailto:mmartin@amm-law.com)

21 Charles A. Michalek (Nevada Bar No. 5721)  
22 ROGERS, MASTRANGELO, CARVALHO &  
23 MITCHEL  
24 700 South Third Street  
Las Vegas, Nevada 89101  
Phone: (702) 383-3400  
Email: [cmichalek@rmclaw.com](mailto:cmichalek@rmclaw.com)

26 ***Attorneys for Defendants Frontier Airlines, Inc.,  
Scott Warren & Rex Shupe***

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2021, I caused the foregoing to be electronically filed with the United States District Court for the District of Nevada using the CM/ECF system.

By: /s/ Brian T. Maye